

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROBERT BROWN and THE ESTATE OF BOBBI
KRISTINA BROWN
Plaintiff's,

Index No. 1:18 CV-11078-CM

-against-

SHOWTIME NETWORKS, INC., BRITISH
BROADCASTING CORPORATION, PASSION
PICTURES CORP, TRACEY BAKER-SIMMONS,
WANDA SHELLEY, B2 ENTERTAINMENT LLC
and SIMMONS SHELLEY ENTERTAINMENT, LLC

**ANSWER OF TRACY BAKER-
SIMMONS, WANDA SHELLEY,
B2 ENTERTAINMENT LLC and
SIMMONS SHELLEY
ENTERTAINMENT, LLC**

Defendants.

-----X

Defendants, Tracey Baker-Simmons, Wanda Shelley, B2 Entertainment LLC and
Simmons Shelley Entertainment, LLC by their attorneys, J. Walker & Associates, LLC, as and
for an answer to the complaint of the Plaintiffs, answers as follows:

GENERAL DENIAL

1. Defendants deny the allegations and does not believe this court has jurisdiction.

ADMISSIONS AND DENIALS

2. Defendants admit the allegations contained in paragraphs numbered 10, and 61 of the complaint.
3. Defendants deny each and every allegation set forth in paragraphs numbered 13, 19, 23, 28, 29, 36, 40, 45, 48, 58, 65, 66, 77 and 79(b) of the complaint.
4. Defendants lack sufficient information or belief to determine at this stage of the proceedings, whether the allegations contained in paragraphs numbered 1, 2, 3, 4, 5,

6, 7, 12, 14, 15, 16, 17, 18, 21, 22, 24, 25, 26, 27, 33, 37, 42, 45, 47, 49, 51, 52, 53, 55, 56, 59, 60, 62, 64, 67, 68, 69, 70, 71, 72, 75, and 78 of the complaint are true or not. On this basis, defendants deny the allegations of these paragraphs.

5. Denies each and every allegation set forth in paragraphs numbered 30, 31, 32, 34, 35, 41, 46, 50, 57, 63, 73, 74 and 79(a) of the complaint except admits that the documents referred therein exist and respectfully refers all questions of law, fact and/or conclusions raised therein with regard to said documents to the Court upon the hearing of this matter.
6. Defendants lack sufficient information or belief to determine at this stage of the proceedings, whether the allegations contained in paragraphs numbered 8, 9 and 10 of the complaint are true or not except admits that defendants Simmons and Shelley had ownership interests in the respective limited liability company defendants named therein.
7. With regard to allegations concerning licenses, defendants lack sufficient information or belief to determine at this stage of the proceedings, whether the allegations contained in paragraph numbered 20 of the complaint concerning same is true or not, defendants deny each and every other allegation set forth in said paragraph.
8. Admit the allegation that defendant B2 is dissolved but denies each and every other allegation set forth in paragraph numbered 76.
9. The allegations contained in paragraphs 38, 39, 43, 44 and 54 of the complaint are mere statements to which no response is required, but to the extent that the averments may be deemed facts, they are denied.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

10. The complaint fails to state a claim on which relief may be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

11. The Plaintiff's complaint and each cause of action therein is barred because it is frivolous and without merit as the defendant's Tracey Baker-Simmons, Wanda Shelley, B2 Entertainment LLC and Simmons Shelley Entertainment, LLC, were never in a contractual relationship with either plaintiff Bobby Brown or The Estate of Bobbi Kristina Brown.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

12. The Plaintiffs lack standing to bring the within proceeding.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

13. This Court lacks subject matter jurisdiction.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

14. This Court lacks jurisdiction over the persons of the defendants.

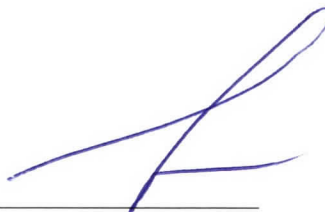
WHEREFORE, Defendants pray judgment as follows:

PRAYER

- A. That Plaintiffs takes nothing by their complaint;
- B. That Plaintiffs complaint be dismissed with prejudice;
- C. That judgement be entered for the Defendants in this action;
- D. That Defendants be awarded their reasonable attorney's fees and expenses in responding to this action;
- E. That Defendants be awarded their costs of suit; and

F. That these answering Defendants be granted any other and further relief that the Court deems just and proper.

Dated: January 23, 2019



Lamont R. Bailey, Esq.
Bailey & Bailey, LLC
186-17 Merrick Boulevard
Springfield Gardens, NY 11413
718-701-5915
lbailey@bblawny.com

of Counsel to:

J. Walker & Associates, LLC
3421 Main Street
Atlanta, GA 30337
(770)-847-7363

Attorneys for Defendants Tracey Baker-Simmons,
Wanda Shelley, B2 Entertainment LLC and Simmons
Shelley Entertainment, LLC

To:

Christopher Brown
CB3465
Brown & Rosen LLC
Attorneys at Law
100 State Street, Suite 900
Boston, MA 02109
617-728-9111 (T)
cbrown@brownrosen.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, a member of the bar of this Court, hereby certifies that Defendants' Answer filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 23, 2019, including but not limited to the following:

Christopher Brown
CB3465
Brown & Rosen LLC
Attorneys at Law
100 State Street, Suite 900
Boston, MA 02109
617-728-9111 (T)
cbrown@brownrosen.com

Attorneys for Plaintiff

Dated: January 23, 2019

/s Lamont R. Bailey
Lamont R. Bailey